



Town of South Kingstown, Rhode Island

Office of the Town Manager

Town Hall ▪ 180 High Street ▪ Wakefield, RI 02879
Tel (401) 789-9331 x1201 ▪ Fax (401) 789-5280
rzarnetske@southkingstownri.com
www.southkingstownri.com

Robert C. Zarnetske
Town Manager

December 14, 2020

Luly E. Massaro
Commission Clerk
RI Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

c/o Jamie Rhodes, Good Energy, LP
jamie.rhodes@goodenergy.com

Re: Comments on Docket 5058

Dear Ms. Massaro and Members of the Commission:

These comments are in response to the RI Public Utilities Commission solicitation in Docket 5058 where National Grid is proposing to provide certain electricity consumer data to municipal aggregation programs in order for a program to effectively execute a competitive bid for electricity supply and subsequently enroll residents in the program consistent with RI Gen. Law §39-3-1.2.

The Town of South Kingstown has taken significant steps towards the implementation of an aggregation program, as documented in Docket 5058. The intention of **The Town of South Kingstown** is to provide new options for electricity supply to our residents and businesses in order to provide more stable – and potentially lower – rates along with increasing the amount of electricity coming from renewable sources as part of climate action plan.

To deliver on these goals, it is necessary for the Public Utilities Commission to allow for the sharing of customer account information. Recognizing that the sharing of this information is a change from past practices, **The Town of South Kingstown** believes that such is change is both required due to the General Assembly's enactment of the authorizing statute, and, in this context, it is also good public policy.

First, by enacting §39-3-1.2, the General Assembly explicitly authorized a municipality to pass “[a]n ordinance or resolution under this section shall specify whether the aggregation will occur only with the prior consent of each person owning, occupying, controlling, or using an electric load center proposed to be aggregated or will occur automatically for all persons pursuant to the opt-out requirements of this section.” The plain language of this statute indicates that a municipality must be able to enroll their residents without prior individual consent, thus any

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requirement to gain individual consent would frustrate the intention of the General Assembly and undermine the effectiveness of the municipal program.

Second, the policy goals of the program of offering lower, stable electricity supply costs and increasing demand for renewable energy is achievable through a truly opt-out program. Based on the experience in other states, **The Town of South Kingstown** is expecting roughly 85% of eligible accounts to be in the program. This level of participation will push suppliers to offer competitive prices without the risk associated with low participation of an opt-in program. Another policy outcome is to make progress on reducing the carbon footprint of *[Municipality]*'s electricity usage. By making the aggregation program the default supply, the program will generate significant demand for additional renewable energy, which has the dual benefit of reducing harmful greenhouse gas emissions while simultaneously creating additional market pressure that will support renewable energy generators.

For these reasons, **The Town of South Kingstown** respectfully requests that the Public Utilities Commission approve a policy change as part of this docket that would allow National Grid to share consumer data, including usage history and sufficient information to enroll customers with the aggregation program's vetted supplier, without individual consent. Such action is consistent with the action of the General Assembly and effectuates good public policy.

Sincerely,



Robert C. Zarnetske
Town Manager

cc: Jamie Rhodes, Good Energy, LP
Amy Goins, Town Solicitor's Office